



ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL
FOR
WARNER ROBINS AIR LOGISTICS CENTER
ROBINS AFB, GEORGIA

Prepared by:

Environmental Management Directorate
Robins Air Force Base, Georgia

August 5, 1999

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

FOR

WARNER ROBINS AIR LOGISTICS CENTER
ROBINS AIR FORCE BASE, GEORGIA
CONTRACT NO. F09650-94-D-0035

August 3, 1999

Prepared for
ENVIRONMENTAL MANAGEMENT DIRECTORATE

Prepared By
EARTH TECH/RUST ENVIRONMENT & INFRASTRUCTURE

Earth Tech/Rust E&I Project No. 33348

TABLE OF CONTENTS

	<u>Page No.</u>
BACKGROUND.....	1
4.0 GENERAL	2
4.1 ENVIRONMENTAL POLICY	2
4.2 PLANNING.....	3
4.2.1 General	3
4.2.2 Environmental Aspects	3
4.2.3 Legal and Other Requirements	6
4.2.4 Objectives and Targets	7
4.2.5 Environmental Management Programs	7
4.3 IMPLEMENTATION AND OPERATION	8
4.3.1 Structure and Responsibility	8
4.3.2 Training, Awareness, and Competence	14
4.3.3 Communications	15
4.3.4 Environmental Documentation	16
4.3.5 Document Control	16
4.3.6 Operational Control.....	17
4.3.7 Emergency Preparedness and Response.....	17
4.4 CHECKING AND CORRECTIVE ACTION.....	18
4.4.1 Monitoring and Measurement	18
4.4.2 Non-Conformance and Corrective and Preventive Action.....	19
4.4.3 Records.....	19
4.4.4 Environmental Management System Audit	20
4.5 MANAGEMENT REVIEW.....	20

LIST OF FIGURES

Figure 1	Organizational Chart
Figure 2	Listing of Base Organizations

LIST OF ATTACHMENTS

Attachment 1	Directives and Laws Implemented by this Policy
--------------	--

LIST OF ACRONYMS

AFB	Air Force Base
AFMC	Air Force Material Command
AST	Aboveground Storage Tanks
BPI	Business Performance Indicator
CSI	Compliance Site Inventory
DoD	Department of Defense
ECAMP	Environmental Compliance Assessment and Management Program
EIA	Environmental Impact Analysis
ELP	Environmental Leadership Program
EMS	Environmental Management System
EPA	Environmental Protection Agency
EPC	Environmental Protection Committee
EPD	Georgia Environmental Protection Department
GIS	Geographical Information System
IAP	Initial Accumulation Points
IPT	Integrated Process Teams
JA	Judge Advocate
NEPA	National Environmental Policy Act
ORI	Operational Readiness Inspections
PMEL	Precision Measurement Equipment Laboratory
QPI	Quality Performance Indicator
RAB	Restoration Advisory Board
RCRA	Resource Conservation and Recovery Act
SARA	Superfund Amendment and Reauthorization Act
SOP	Standard Operating Procedure
SOW	Statements of Work
UAC	Unit Air Coordinator
UEC	Unit Environmental Coordinator
USAF	U.S. Air Force
UST	Underground Storage Tanks
WR-ALC	Warner Robins Air Logistics Center

BACKGROUND

Robins Air Force Base (AFB) was originally developed in 1941, during World War II, as an airfield depot. Currently, it covers approximately 8,800 acres of land located in central Georgia, east of the city of Warner Robins and west of wetlands of the Ocmulgee River. There are currently over 1,300 structures on Robins AFB, that cover 3.8 million square feet of industrial maintenance shops, 1.7 million square feet of administrative space, and 3.5 million square feet of storage space. Robins AFB currently employs approximately 19,650 persons, mostly civilian employees. As such Robins AFB is considered the largest industrial employer in Georgia. The Base's runway is the largest in Georgia, measuring more than 12,000 feet long by 300 feet wide, with two 1,000 foot overruns.

The main operable organization on Robins AFB is the Warner Robins Air Logistics Center (WR-ALC). The main function of the ALC is to provide major aircraft and weapon system maintenance and overhaul support (referred to as Depot Level Maintenance) to the U.S. Air Force (USAF) and auxiliary organizations such as State Air National Guard Units. The mission of the WR-ALC is to provide affordable combat superiority, readiness, and sustainability to the war fighters. Currently WR-ALC provides depot level maintenance for the C-5, the C-130, the F-15, and the C-141 aircraft weapon systems.

The ALC determines the spare parts, supplies, and equipment needed to support the weapon systems and commodities for which it has management responsibility. The ALC budgets for purchases and distributes, maintains, repairs, and disposes of these systems and commodities. The primary workload consists of the repair and maintenance of the various types of aircraft.

Robins AFB is home to the 78 Air Base Wing, that operates the airfield, the Aviation Museum, and various support services on the base. Robins AFB is also the main U.S. operating base for the aircraft, including the 116th Bomber wing (B-1), the 19 ARW Air Refueling Wing (KC-135) and the 93 Air Control Wing also referred to as Joint STARS (KC-135).

Robins AFB is also the technology repair center for airborne electronics, gyros, and life-support systems. The ALC has various aerospace-related shops (plating, machining, metal bonding, etc.) that support the major workload activities.

Robins AFB also has geographic area logistics support responsibility for procurement, supply, and maintenance functions for all Air Force installations east of the Mississippi River (except Wisconsin and Illinois).

Considering the age and history of Robins AFB, together with the enormous size, and varied mission requirements, there is a need for a strong environmental management system to maintain compliance with numerous regulations and to protect the well being of the surroundings.

4.0 GENERAL

This manual contains general information on how environmental affairs are managed at Robins AFB. The environmental management system (EMS) described herein was designed to conform to the International Standards for Environmental Management Systems described by ISO 14001:1996(E). The reader will note that the headings in the manual reflect the major elements of the ISO 14001 standard.

4.1 ENVIRONMENTAL POLICY

The Robins AFB environmental policy is included below. It may also be found on the Environmental Management Director (EM) webpage (www.em.robins.af.mil- *ISO14000 – Policy Statement*).

Achieving, maintaining and improving environmental quality is an essential part of the Robins AFB mission. Robins AFB management is committed to: cleaning up environmental damage resulting from its past activities; complying with environmental standards applicable to its present operations; planning its future activities to minimize environmental impacts; conserving the irreplaceable natural and cultural resources present on the installation; and maximizing pollution prevention initiatives. Robins AFB has set and will periodically review environmental objectives and targets for achieving these commitments.

Robins AFB shall conduct its activities according to Federal, State, Department of Defense (DoD), Air Force, and local environmental policy. Commanders at all levels are responsible for compliance with all relevant environmental policy. All Robins AFB employees, including military, civilian, and contractor personnel, are responsible and accountable for the environmental consequences of their actions.

The Robins AFB environmental program has been developed and implemented, and is underpinned by the four pillars of cleanup, compliance, conservation, and prevention of pollution.

Cleanup

Robins AFB shall reduce health and environmental risks created or caused by past and present operations. Robins AFB will rapidly identify, characterize, and clean up known contamination. Through its Restoration Advisory Board (RAB), Robins AFB will encourage open, unbiased, comprehensive, and cost-effective cleanup and protection of human health and public well-being by involving the public and regulatory agencies.

Compliance

Robins AFB shall comply with applicable Executive Orders, Federal, State, DoD, Air Force, and local environmental laws, standards, and requirements.

Environmental media program managers shall devise and implement management plans where required by regulation and ensure such plans are properly disseminated and adhered to.

Conservation

Robins AFB shall conserve natural and cultural resources through effective environmental planning and management. The environmental consequences of proposed actions and reasonable alternatives will be integrated into all levels of decision making in accordance with the National Environmental Policy Act (NEPA). The environmental resources under Robins AFB stewardship will be protected and managed in the public and national interest. Environmental conservation requirements, opportunities, and constraints shall be consolidated in comprehensive plans for installation development.

Prevention of Pollution

Robins AFB shall prevent future pollution by reducing the use of hazardous materials and releases of pollutants into the environment to as near zero as feasible and practical. This will be done first through source reduction (e.g., chemical substitution, process change, and other techniques). Where environmentally damaging material must be used, the quantity used will be minimized via the installation Hazardous Materials Pharmacy Program. When the use of hazardous materials cannot be avoided, the spent material and waste will be reused or recycled, whenever possible. As a last resort, spent material and waste that cannot be reused or recycled will be disposed of in an environmentally safe manner, consistent with the requirements of applicable laws. Environmental costs will be accounted for in computing weapon system life-cycle costs.

Robins AFB will administer appropriated funding to execute environmental activities needed to comply with regulations and requirements and to prevent pollution.

4.2 PLANNING

4.2.1 General

This section outlines the environmental management system planning process. This process involves identifying environmental aspects, and legal and other requirements, establishing objectives and targets, and establishing environmental management programs.

4.2.2 Environmental Aspects

Environmental aspects are those elements of an organization's activities, products or services that can interact with or have an impact upon the environment. An initial identification of the

aspects associated with operations and activities conducted at Robins Air Force Base has been completed. Environmental aspects at Robins AFB are cataloged in the Compliance Site Inventory database and the Robins AFB Geographical Information System (GIS).

In late 1998, Robins AFB began implementation of the Compliance Site Inventory (CSI) database in response to a MAJCOM directive. The CSI database was developed as described in a HQ/AFMC/CEV letter dated 24 November 1998. The CSI database is a listing of sites, locations, and operations that have environmental regulatory requirements associated with them. As of June 1999, the CSI database included the following sites:

- Wastewater pretreatment facilities (including Silver Recovery Units and Oil/Water separators)
- Aboveground storage tanks (ASTs) and Underground storage tanks (USTs)
- Hazardous waste management sites [including 90-day accumulation sites and initial accumulation points (IAPs)]
- Sites identified for investigation/remediation (RCRA SWMUs)
- Wastewater/storm water outfalls
- Chemical storage areas (subject to EPCRA Reporting Requirements)
- Air emission sources

Other, non-regulatory environmental aspects are, or will be, cataloged on the Robins AFB GIS. The Robins GIS includes information on environmental aspects such as utilities, threatened and endangered species habitats, and wetland areas.

At Robins AFB there is a continual process for identifying and reviewing new aspects that may have environmental impacts, and these aspect updates are recorded in the CSI database or the GIS. This process is multi-fold and involves a number of different processes:

- a. The first step is the installation's Environmental Impact Analysis (EIA) process. In accordance with AFI 32-7061 (EIA process) and AFI 32-7066 (Environmental Baseline Surveys in Real Estate Transactions), EIA reviews (including completion and review of 332 and 813 forms) are performed for each and every new process, project, or construction at Robins AFB to determine environmental aspects and to ensure new projects, processes, etc. minimize environmental impact, whenever possible. Another review process related to EIA is the Installation Facility Review Board Meeting where new and ongoing facilities, processes, missions,

etc. are reviewed. Representatives from EM participate in the facility reviews. See AFI 32-7061 for details related to this process.

- b. New processes and projects which are identified as having environmental aspects and impacts are recorded in the CSI database. In accordance with AFI 32-7080 (Pollution Prevention Program), these processes and projects are prioritized for review.
- c. The Hazardous Waste Management Plan and Air Force Material Command (AFMC) Hazardous Waste Standard Operating Procedure (SOP) requires quarterly verification of hazardous waste streams. See the Hazardous Waste Management Plan for details related to this process.
- d. The Air SOP requires annual verification of air emission sources. See the Air SOP for details related to this process.
- e. Aspects and impacts are further identified and methods developed to manage them within the Robins AFB Integrated Process Teams (IPTs). EM program managers or Base organization personnel identify new or changing environmental aspects. IPT structure is further discussed in Section 4.2.5.
- f. Items identified by the various IPTs are then brought to the Robins AFB Environmental Protection Committee (EPC). The EPC is discussed further in Sections 4.3 and 4.5.
- g. The Robins AFB internal audit programs, the Environmental Compliance Assessment and Management Program (ECAMP) and the EMS Audit Program, may also act as safeguards for identifying environmental aspects and impacts not yet identified by the NEPA process or any of the installation environmental IPTs. The internal audit programs are the Robins AFB method of determining compliance with environmental regulation. The audits may be used to discover where impact to the environment is occurring for which no planning or proper procedures for controlling adverse environmental impact have been implemented. ECAMP sets a strict reporting and corrective action requirement for all issues which have adverse impacts upon the environment when such action is not a “permitted or allowed” impact. The ECAMP/EMS IPT conducts evaluations and

tracks the closure of environmental compliance and management system findings. (ECAMP and EMS auditing is discussed further in Section 4.4.4 Environmental Management System Audit).

4.2.3 Legal and Other Requirements

It is the responsibility of the EM Director to ensure that his/her staff maintains currency with environmental regulations and Department of Defense Directives as they apply to Robins AFB. EM program managers manage the operating and discharge permits required by state and federal regulation. It is the responsibility of program managers to budget for and attend training as necessary for successful accomplishment of their duties. EM program managers also work closely with Staff Judge Advocate (JA) counsel to ensure environmental compliance is maintained. EM has access to two environmental lawyers, who attend weekly EM staff meetings to pass on pertinent environmental compliance guidance and to ensure all relevant issues are properly researched. Legal requirements are communicated to base personnel through policy letters, quarterly newsletters, management plans, IPT and EPC meetings, formal regulations, and training. Tenant organizations also participate in host-tenant support agreements and contracts. Attachment 1 to this manual is a summary of environmental regulations Robins AFB is subject to.

Information sources for environmental legal and other requirements reviewed by EM and JA personnel may include, but not be limited to, the following:

- Federal Register
- Code of Federal Regulations
- Executive Orders
- State Register
- Georgia Regulations
- Regulatory training seminars/workshops
- DoD publications
- Air Force instructions
- Trade and business publications
- Newspapers

4.2.4 Objectives and Targets

Environmental requirements are specifically outlined by environmental regulation and permit. Objectives designed to meet these requirements as well as the needs and desires of the community are expressed in the EM Tactical Plan and EM's Business Area Plan. Each EM Division (e.g., restoration, compliance, pollution prevention, natural resources) has measurable targets tracked by EM through the Quarterly Quality Metrics system. The metrics are reported quarterly at installation EPC meetings and up to Headquarters AFMC, Civil Engineering, Environmental Compliance Division.

Targets are designed to drive proactive behavior to lessen the environmental impact to the installation and surrounding community. At Robins AFB, each Base organization incorporates a section on environmental management in their individual tactical plan that includes environmental targets for the organization to achieve. In order to drive goal-oriented behavior, the over-arching WR-ALC Strategic Plan targets are expressed in the form of a tactical plan. The tactical plan expresses the installation's overall goals, in which proper environmental compliance is critical. The tactical plan and EM's Business Plan expresses the installation's quantitative target for listed environmental issues (including Restoration, Compliance, Conservation, and Prevention of Pollution). The WR-ALC Tactical Plan is updated from year to year to adjust for changing requirements.

4.2.5 Environmental Management Programs

Robins AFB maintains several environmental management programs that have been established for achieving objectives and targets. Environmental Management programs may be developed at the MAJCOM level or locally by IPTs. The environmental management programs designate and distribute responsibilities for achieving objectives and targets as well as performing specified environmental activities – which are the means for achieving the Targets. The programs also identify the time frames within which the objectives and targets are to be achieved or performed.

IPTs have been established to manage the following major environmental areas: air quality, hazardous materials, hazardous waste, pesticides, pollution prevention, water quality, internal environmental compliance auditing, and other areas on an “as needed” basis. IPTs are composed of EM program managers and other Base organization personnel whose mission involves several environmental aspects that have or may have impact upon the environment. Within these IPTs,

EM program managers or Base organization personnel identify new or changing environmental aspects.

The following environmental management programs have been implemented at Robins AFB.

- **Hazardous Materials Pharmacy Program.** Under this program, hazardous materials are stored in centralized, controlled area and screened and tracked for reporting purposes when ordered. The program is designed so the smallest unit of issue is distributed, with “just in time” supply as the goal.
- **Solid Waste Reduction Program** – The program was established to reduce municipal solid waste generated on Robins AFB by 50% compared to the baseline year of 1992.
- **Hazardous Waste Reduction Program** – This program was established to reduce total hazardous waste generated by 2% annually with an ultimate goal of a 50% reduction in total hazardous waste generated compared to a 1992 baseline.
- **Toxic Release Inventory (TRI) Chemical Reduction Program** – The objective of this program is to reduce the total amount of TRI chemical releases by 50% compared to the baseline year of 1994.
- **Waste Recycling program** – The objective of this program is to achieve a solid waste diversion rate of 40%.
- **Energy Conservation Program** (electricity, natural gas consumption) - This program was established to reduce energy consumption by 10% based on a 1995 baseline.
- **Environmental Compliance Assessment Management Program** – This program was established to conduct annual internal and external environmental compliance audits to improve overall compliance with regulations.

4.3 IMPLEMENTATION AND OPERATION

4.3.1 Structure and Responsibility

The WR-ALC Vice Commander (CV) is the senior management official charged with managing environmental issues at Robins AFB. The WR-ALC/CV Chairs the EPC. The EPC is the installation decision making body for environmental concerns. The EPC is composed of senior representatives from each Base organization. The EPC meets quarterly to discuss environmental issues concerning Robins AFB.

The EM, is charged with developing and implementing environmental policy for Robins AFB. EM's plans, policies, directives, and measurement of key compliance and pollution prevention indicators are all designed to achieve an effective EMS. The EM Director is supported by three Division Chiefs. Specific roles and responsibilities for personnel within the EM Directorate are outlined in the EM organizational chart (see Figure 1). EM personnel position descriptions, performance plans, program management plans (as required by DoD and Air Force regulation), and supervisor instructions provide clear guidance on expected accomplishment of duties. The three divisions within EM are described as follows:

EMP: This division is responsible for centralized Hazardous Waste Operations, Pollution Prevention (including hazardous waste reduction and chemical substitution), Air Quality compliance programs (such as the Aerospace NESHAP), Solid waste recycling, SARA Title III reporting, and Spills management), and Hazardous Materials Pharmacy Operations. This includes working with organizations on Robins AFB to prevent, at the source, harmful releases to air, land, surface water, and groundwater; and when releases cannot be totally eliminated, to control the waste streams so they are the least toxic, smallest volume, and most easily managed. Prevention of pollution practices is implemented in acquisitions, operations, and maintenance programs. The overall goal is to continually improve and work toward zero discharge of pollutants (from any media) into the environment through instilling prevention values and a hierarchy of methods.

EMQ: Implements and manages the Installation's Compliance and Restoration Programs in accordance with federal, state, and local environmental regulations. The Compliance section is responsible for Water Quality compliance programs (including drinking water, wastewater, and stormwater), Aboveground and Underground Storage Tank compliance, as well as Asbestos, Lead-Based Paint, and PCB identification and compliance. The section conducts inspections, recommends engineering modifications and procedures to correct discrepancies, and manages programs to ensure regulatory agency permits are obtained and their provisions met. The Restoration Section is responsible for identification, investigation, and cleanup of contaminated sites on the base.

EMX: Responsible for planning and programming in all environmental areas. Conservation and resource programs such as natural and cultural resources, EIA review, and ECAMP management are located in this division. In addition, the division is responsible for managing budget,

information systems (Geographical Information System [GIS], computer management, etc.), manpower, supplies, and equipment.

Most program areas (e.g., water, air quality) maintain management plans that describe how the environmental aspects associated with the program are to be managed on Robins AFB. Program area managers ensure management plans and any associated SOPs are available, familiar, and adhered to by affected organizations. Management plans and SOPs are listed in Attachment 1.

EM seeks to obtain a commitment of financial resources (on the part of EM and other Base organizations) required to maintain and achieve environmental compliance through the annual planning, programming, and budget appropriation process, which is controlled by the Air Force. EM has appointed the ECAMP/EMS manager as the ISO 14001 Management Representative. Members of the ECAMP/EMS IPT will serve as ancillary ISO 14001 Management Representatives to their organizations.

Within each Base organization, personnel responsible for facilitating environmental compliance have also been identified and trained. Base organizations have developed their own procedures for defining, documenting, and communicating the duties of their personnel. Base organizations have provided formal documentation to EM of personnel assigned the duty of Unit Environmental Coordinator (UEC), Unit Air Coordinator (UAC), Hazardous Waste Accumulation Site Manager. See Figure 2 for a listing of Robins AFB organizations.

Figure 1
Organizational Chart

Directorate of Environmental Management

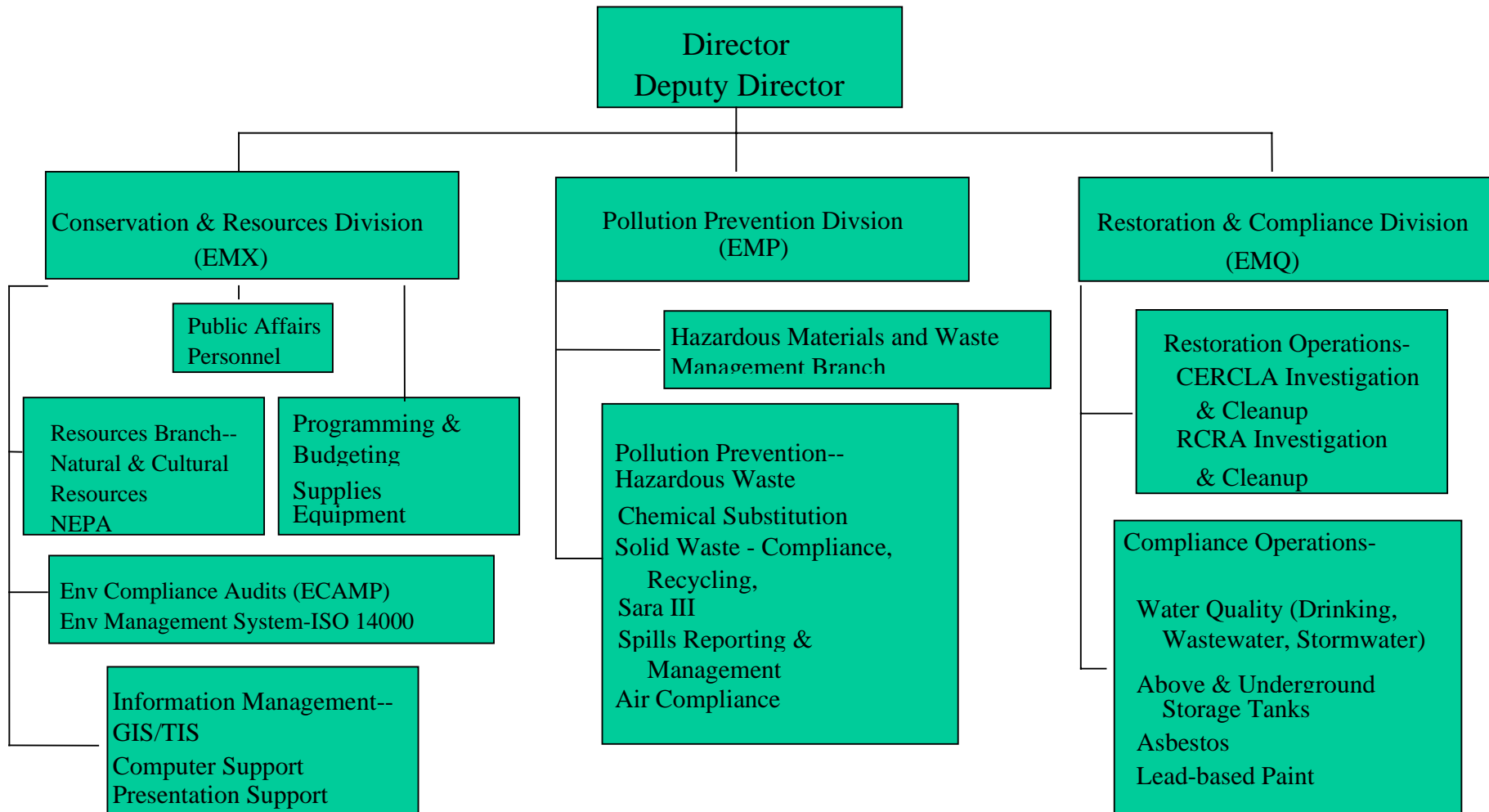


Figure 2
Listing of Base Organizations

Installation Commander

WR-ALC/CC - Commander

WR-ALC/CV - Vice Commander and Environmental Protection Committee Chair

Product Directorates

WR-ALC/EM - Environmental Management

WR-ALC/FM - Financial Management

WR-ALC/IG - Inspector General

WR-ALC/JA - Staff Judge Advocate

WR-ALC/LB - C-130 System Program Office

WR-ALC/LC - C-5 System Program Office

WR-ALC/LF - F-15 System Program Office

WR-ALC/LJ - C-141 System Program Office

WR-ALC/LN - Electronic Warfare Management

WR-ALC/LR - U-2 Specialized Management Directorate

WR-ALC/LY - Avionics Directorate

WR-ALC/PA - Office of Public Affairs

WR-ALC/PK - Contracting

WR-ALC/QL - Specialized Management

WR-ALC/RE - Re-Engineering Directorate

WR-ALC/SE - Safety Office

WR-ALC/TI - Technology & Industrial Support

Air Base Wing

78 ABW/CC - Air Base Wing Commander

78 ABW/XPE - Plans – Engineering/Systems Support

78 ABW/LGS - Supply Division

78 ABW/LGT - Transportation Division

78 ABW/MU - Museum of Aviation

78 CEG/CC - Base Civil Engineer

78 AMDS/SG - Medical Group

78 OSS/CC - Operations Support Squadron (Airfield Ops)

78 SPTG/CC - Support Group Commander

78 SPTG/DP- Personnel Division

78 SPTG/SV - Recreation & Services

78 CS/CC- Communications Squadron

Tenants

AAFES - Army/Air Force Exchange Services (under 78 SPTG)
AFOSI Detachment 105
HQ AFRC – Headquarters, Air Force Reserve Command
US Army Corps of Engineers (COE)
Base Schools Office
DDWG - Defense Distribution Depot (DLA)
DRMO - Defense Reutilization and Marketing Office (DLA)
19 ARG – Air Refueling Group
93 ACW - Joint STARS (Joint Surveillance Aerial Reconnaissance)
653 CLSS - Combat Logistics Support Squadron
5 CCG - 5th Combat Communications Group
116 BW - B1 Bomber Wing (GA ANG)

GENERAL NOTE: Includes all contractors performing government work.

4.3.2 Training, Awareness, and Competence

Environmental training requirements are outlined in Federal, State, DoD, and Air Force regulations, SOPs, and Robins AFB management plans. EM works with the Base organizations to identify specific training requirements and has provided training to the various organizations. Within EM, training plans for each employee are developed annually to ensure employees maintain competency (as required by regulation and/or responsibility) within his/her program area. Training plans are maintained by EM supervisors.

Environmental training for EM personnel and all Base personnel whose duties relate to environmental aspects includes the following:

- The importance of conformance with the environmental policy and procedures and with the requirements of the EMS.
- The significant environmental impacts, actual or potential, of individual work activities and the environmental benefits of improved personal performance.
- Individual roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the EMS, including emergency preparedness and response requirements.
- The potential consequences of departure from specified operating procedures.

Each Base organization is responsible for developing, documenting, and implementing their own procedures for managing their training program. Within the Base organizations, the organizational UEC and various other staff (such as unit training monitors), in conjunction with EM program manager guidance, identify personnel whose positions require specific environmental training. Training is then accomplished through various means (e.g., EM provides training to personnel, contractor provides training, UEC provides training, etc). Each Base organization maintains records of training. At a minimum, all Base personnel receive training on Base environmental policies and procedures, the importance of conformance with environmental procedures, and the hazards of their workplace (including information on hazardous materials and emergency response).

Training is verified during monthly walk-through inspections conducted by the Product Directors/Commanders, SOP inspections, no-notice environmental compliance inspections conducted by the UECs or by EM personnel, emergency response drills, and operational readiness inspections (ORIs). Environmental compliance shortfalls are recorded.

Qualifications and training requirements for personnel appointed to specific environmental duties (e.g., UECs, UACs) are contained in Air Force regulations and SOPs (i.e., Hazardous Waste SOP, Air Force regulation for wastewater treatment).

Contractor training requirements, including specific environmental training to comply with all applicable laws and regulations, are written into the contracts and briefed to contractors during project initiation meetings. In most cases, it is the contractor's responsibility to obtain required training. The contractor is responsible for maintaining suitable documentation of training.

4.3.3 Communications

The Director of EM is the primary authority for communicating information on environmental matters to interested parties both within and outside of Robins AFB. Communication from regulatory agencies is primarily directed to the Director, who relays it to the responsible Division Chief, who will in turn assign it to the relevant program manager. Certain communications will be handled by or coordinated with the Robins AFB Public Affairs Office, the JA, and/or the installation Commander. The Public Affairs Office maintains written procedures for communications regarding environmental issues.

Base organizations are requested to direct their questions and comments regarding environmental regulatory concerns to EM instead of contacting outside regulatory agencies.

Some methods of formal and informal communication used at Robins AFB include:

- Quarterly Restoration Advisory Board (RAB) meetings,
- The quarterly environmental newsletter "*The Enformer*,"
- The weekly base newspaper "*The Rev-Up*,"
- Public notices in local newspapers,
- Quarterly EPC meetings and meeting minutes,
- Policy letters,
- Base operating instructions,
- Management plans and SOPs,
- "How-to" brochures,
- Pre-Construction Guidebook
- IPT meetings and other project meetings,

- Email correspondence,
- Resource Conservation and Recovery Act (RCRA) team meetings with Georgia Environmental Protection Department (EPD) and the U.S. Environmental Protection Agency (EPA) Region IV,
- EM webpage (<http://www.em.robins.af.mil>), and
- Telephone conversations.

Communications regarding environmental issues may be submitted to the *Commander's Action Line* (published in "*The Rev-Up*") or submitted to EM or Public Affairs through the various means of correspondence outlined above. Such correspondences are assigned a tracking number and must be responded to within a specified amount of time, depending on circumstances.

At the discretion of individual EM personnel, verbal communications may or may not be documented. However, verbal communications regarding policy or regulatory interpretations are documented.

Each Base organization is responsible for developing, documenting, and implementing their own internal communication procedures.

4.3.4 Environmental Documentation

Environmental documentation for the Robins AFB includes laws, Executive Orders, DoD publications, permits, and management plans. See Attachment 1 for a listing of environmental documentation.

4.3.5 Document Control

Document control is achieved through use of the EM webpage to distribute relevant and applicable regulations, management plans, and SOPs. Organizational UECs use this webpage to provide their organization the most current and up-to-date information and version of controlled documents. In this fashion, EM is more able to prevent obsolete versions of controlled documents from being used and to save paper and manpower hours by not making standard distribution of hardcopy controlled documents.

Printed controlled EM documents include a header or footer indicating the lifespan of the document. The printed document is considered obsolete beyond the lifespan date and should be destroyed.

EM program managers periodically review the web pages and provide needed revisions to the EM Webmaster.

Base organization EMS documents are controlled through a standardized system, according to a template provided by EM to the Base organizations.

4.3.6 Operational Control

Management plans exist for identified environmental aspects and impacts on Robins AFB (see Attachment 1). These base-specific plans and procedures outline steps that must be followed to achieve compliance with applicable regulations. Base organizations may also develop operational control procedures specific to organizational operations. These procedures are controlled as outlined in Section 4.3.5.

The Base Contracting Office has included a standard statement in all contractor agreements regarding the contractor's responsibility to comply with all federal, state, and local regulations. EM reviews construction specifications and statements of work (SOW) for each contracted project and prepares the regulatory requirements section for each specification and SOW. EM participates in contractor orientation meetings according to the Pre-Construction Guidebook, during which specific regulatory requirements are presented to the contractor both verbally and via a written handout.

4.3.7 Emergency Preparedness and Response

Emergency Preparedness and Response is handled predominantly through the Disaster Preparedness office with input from various base organizations, including EM. EM oversees the development and review of environmentally-specific Emergency Response Plans such as the Oil Spill Facility Response Plan and the Chemical Release Emergency Response Plan. EM is also the organization responsible for reporting spills to external regulatory agencies, as required. Superfund Amendment and Reauthorization Act (SARA) Title III requirements regarding hazardous materials on site are also handled and reported by EM.

Base personnel with hazardous materials, hazardous waste, spill response, or other related duties are provided spill and emergency response training. All Base employees are provided entry-level emergency response training in their introductory safety briefing and by ongoing contingency drills and exercises.

Robins AFB personnel report spills and other emergencies by dialing “911”. The “911” dispatcher then notifies the proper Base authorities (EM, Spill Team, Security Police, and OSI). WR-ALC PLAN 19-2 defines specific procedures for spill notification and response procedures.

4.4 CHECKING AND CORRECTIVE ACTION

4.4.1 Monitoring and Measurement

Permits, management plans, and SOPs outline specific monitoring and measurement of activities that have environmental impacts. Methods of monitoring and measurement employed at Robins AFB include, but are not limited to, the following:

- Laboratory analysis of suspected and confirmed contamination of various media (e.g., contaminated soil from a spill, wastewater discharged at an outfall measuring point);
- Monitoring of certain air pollution control equipment;
- Reports of hazardous material purchases and use;
- Reports of hazardous waste disposal;
- Reports of hazardous waste reduction;
- Energy use reports;
- Calibration measurements of key equipment (performed and maintained by the Precision Measurement Equipment Laboratory [PMEL] within the TI Directorate); and,
- Threatened and endangered species surveys.

Basewide sampling of groundwater may be useful for evaluating the significance of and changes in environmental impacts at Robins AFB. Sampling is performed for a broad spectrum of environmental contaminants. Changes in contaminant level or identification of new contaminants may indicate changes in environmental impact. If such changes are observed, Robins AFB takes action to determine the source of the contaminant and institute changes or mitigation efforts, where required.

Each division manager within EM maintains procedures to monitor and measure key characteristics of operations and activities that can have a significant impact on the environment. These procedures are defined in the Environmental Management Product Descriptor Sheets. Key performance indicators are evaluated and reported to the EPC and the AFMC Headquarters on a quarterly basis.

Robins AFB also participates in the Department of Defense Environmental Compliance Assessment Management Program (or ECAMP). This is a program of annual internal facility-wide audits designed to evaluate compliance with relevant environmental regulations. A team assembled by AFMC Civil Engineering Headquarters will conduct an external ECAMP audit every third year. Procedures and protocols for conducting ECAMP audits are documented in Department of Defense ECAMP Manuals.

4.4.2 Non-Conformance and Corrective and Preventive Action

Results of audits and inspections are recorded in written form. Audit findings will be annotated on the appropriate Robins AFB audit findings form (examples are included within this manual as Attachments 3 and 4). For each finding identified during an audit, a copy of the appropriate form will be forwarded to the responsible organization's branch chief (or designated senior management representative) as well as the organization's UEC. For all Significant, Major or Minor findings, the organization shall prepare a written response including a corrective measure to remedy the finding. This documentation is signed by the branch chief (or senior management representative) and forwarded to the EM coordinator who maintains this documentation.

A final report consolidating all environmental findings will be produced briefed to the EPC. Status of findings and actions taken to correct them will be tracked by the EMS program manager and briefed at the quarterly EPC meetings along with the status of open findings. Follow-ups to audit findings will be conducted by the audit team.

4.4.3 Records

EM follows the Air Force Files Maintenance and Disposition System specified in AFI 37-122 "*Air Force Records Management Program*" and AFI 37-138 "*Records Disposition—Procedures and Responsibilities*" for maintenance of records of policies and procedures related to its EMS.

These instructions include direction regarding retention periods and disposition of records. Certain records are maintained indefinitely due to possible future regulatory requirements. Records are maintained within the Directorate's file system. Hardcopies of such records may or may not be maintained at the individual program manager's desk as deemed most convenient or practical by the program manager. Disposition of records are outlined in the Files Management and Disposition Plan. (Refer to file plan.)

Other records are maintained by organizational UECs. Examples of such records include inspection reports, training records, and other miscellaneous items. These records are maintained in accordance with policy set by the individual Base organization and EM guidance.

4.4.4 Environmental Management System Audit

Robins AFB conducts internal management system audits annually in accordance with guidance outlined in the ISO 14010 standard and guidance from EPA's Environmental Leadership Program (ELP). EMS audits are designed to examine how Robins AFB as a whole conforms to the requirements of the ISO 14001 and ELP standards and to evaluate if the EMS has been properly implemented and maintained. EMS audits may or may not be conducted in tandem with the annual ECAMP compliance audit. The audit team will be led by the ECAMP program manager and will consist of a trained team drawn from the ECAMP team. The ECAMP team is composed of UECs from most base organizations.

4.5 MANAGEMENT REVIEW

Robins AFB senior management reviews and evaluates the overall EMS at quarterly EPC meetings. As they become available, the results of the ECAMP and EMS audits are reviewed by the EPC to identify the possible systemic causes of environmental discrepancies. All environmental program areas are covered at the review. Items requiring particular management attention and action are discussed in detail. Status reports on the various programs, as well as Quality Performance Indicator (QPI) and Business Performance Indicator (BPI) charts are used. QPIs provide a quantitative illustration of how successful Robins AFB has been in meeting set objectives and goals. Often QPIs are driven by regulation and are tied to the EM (and Robins AFB) Tactical Plan. BPIs illustrate how efficiently the installation is addressing its environmental aspects. BPIs look at program cost and effectiveness. Many QPIs and BPIs are then reported up the chain of command to Headquarters AFMC, Civil Engineering, Environmental Compliance Division. QPIs/BPIs provide information to the Robins AFB senior

leadership on where to focus attention, personnel, budgeting actions, and facilitate quality improvement decision making.

All discussions conducted and decisions made regarding the Robins AFB EMS, including it's suitability, adequacy, and effectiveness and the possible need for changes to the policy, objectives, or other elements of the EMS are recorded in written form. Copies of the meeting minutes are distributed to EPC members, UECs, and other Bases in the command.

Attachment 1
DIRECTIVES AND LAWS IMPLEMENTED BY THIS POLICY

Robins AFB is subject to the following statutes, regulations, and international protocols, as currently amended:

Clean Air Act (14 July 1955).

- 40 CFR 63 - National Emission Standard for Hazardous Air Pollutants – Aerospace Industry
- 40 CFR 70 – State Operating Permit Programs
- Georgia Rule 39-3-1 Air Quality Control

Clean Water Act (18 October 1972).

- 40 CFR 122-125 – NPDES Regulations
- Georgia Rule 39-3-6 Water Quality Control

Comprehensive Environment Response Compensation and Liability Act of 1980 (11 December 1980).

- 40 CFR 302 Designation, Reportable Quantities, and Notification Requirements for Hazardous Substances
- Georgia Rule 391-3-19 Hazardous Site Response

Endangered Species Act (10 November 1978).

Federal Facilities Compliance Act of 1992 (6 October 1992).

Montreal Protocol of Substances That Deplete the Ozone Layer (September 1987).

National Defense Authorization Act for FY 1993 (1 October 1992).

National Environmental Policy Act of 1969 (1 January 1970).

- 40 CFR 6 – National Environmental policy Act Procedures
- 40 CFR 1500-1517 Council on Environmental Quality – Policy Regulations
- Georgia Rule 391-3-16 Rules for Environmental Planning Criteria
- Georgia Rule 391-3-18 Environmentally Sensitive Property

National Historic Preservation Act (15 October 1966).

Oil Pollution Act of 1990 (18 August 1990).

- 40 CFR 110 – Regulations of Discharge of Oil
- 40 CFR 112 – Oil Pollution Prevention

Pollution Prevention Act of 1990 (5 November 1990).

Public Law 97-214, 10 U.S.C. Section 2577, Disposal of Recyclable Materials (12 July 1982).

Resource Conservation and Recovery Act (21 October 1976).

- Georgia Rule 391-3-4 Rules for Solid Waste Management
- 40 CFR 260 – 268 – Federal Hazardous Waste Management Rules
- Georgia Rule 391-3-11 Hazardous Waste Management
- 40 CFR 279 – EPA Standards for Managing Used Oil
- Georgia Rule 391-3-15 Underground Storage Tank Management

Safe Drinking Water Act (16 December 1974).

- 40 CFR 141-143 – National Primary and Secondary Drinking Water Standards
- Georgia Rule 39-3-5 Rules for Safe Drinking Water

Sikes Act (31 December 1982).

Superfund Amendments and Reauthorization Act / Emergency Planning and Community Right-to-Know Act of 1986 (17 October 1986).

- 40 CFR 355 Emergency Planning and Notification
- 40 CFR 370 Hazardous Chemical Reporting and Community Right to Know Requirements
- 40 CFR 372 Toxic Chemical Release Reporting Regulations

Toxic Substance Control Act (11 October 1976).

- 40 CFR 745 – Lead Based Paint Poisoning Prevention in Certain Residential Structures
- 40 CFR 761 – Manufacturing processes, distribution in commerce, and use prohibitions
- 40 CFR 763 – Rules for Asbestos Management

Water Quality Act of 1987 (4 February 1987).

- Georgia Rule 39-3-6 Water Quality Control

A3.2. Robins AFB is subject to the following Executive Orders relating to environmental issues as currently amended:

<u>Executive Order</u>	<u>Title</u>	<u>Date</u>
11593	<i>Protection and Enhancement of the Cultural Environment</i>	13 May 1971
11988	<i>Flood Plain Management</i>	24 May 1977
11990	<i>Protection of Wetlands</i>	24 May 1977
12088	<i>Federal Compliance With Pollution Control Standards</i>	13 October 1978
12114	<i>Environmental Effects Abroad of Major Federal Actions</i>	4 January 1979
12580	<i>Superfund Implementation</i>	23 July 1987
12777	<i>Implementation of the Federal Water Pollution Control Act and Oil Pollution Control Act</i>	18 October 1991
12856	<i>Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements</i>	4 August 1993
12873	<i>Federal Acquisition, Recycling, and Waste Prevention</i>	20 October 1993
12902	<i>Energy Efficient and Water Conservation at Federal Facilities</i>	8 March 1994

Robins AFB is subject to the following DoD publications relating to environmental issues:

<u>Publication Number</u>	<u>Publication Title</u>	<u>Date</u>
DoD Instruction 4120.14	<i>Environmental Pollution Prevention, Control and Abatement</i>	30 August 1977
DoD Instruction 4165.57, With Change 1	<i>Air Installation Compatible Use Zones</i>	8 November 1977
DoD Instruction 4165.59	<i>DoD Implementation of the Coastal Zone Management Program</i>	29 December 1975
DoD Directive 4165.60	<i>Solid Waste Management Collection, Disposal, Resource Recovery and Recycling Program</i>	4 October 1976
DoD Directive 4210.15	<i>Hazardous Materials Pollution Prevention</i>	27 July 1989
DoD Instruction 4700.2	<i>Secretary of Defense Awards for Natural Resources and Environmental Management</i>	15 July 1988
DoD Directive 4700.4	<i>Natural Resource Management Program</i>	24 January 1989
DoD Directive 4710.1	<i>Archaeological and Historical Resources Management</i>	21 June 1984
DoD Directive 5030.41, With Change 1	<i>Oil and Hazardous Substances Pollution Prevention and Contingency Program</i>	1 June 1977
DoD Directive 5100.50, With Changes 1 and 2	<i>Protection and Enhancement of Environmental Quality</i>	24 May 1973
DoD Directive 6050.1	<i>Environmental Effects in the United States of DoD Actions</i>	30 July 1979
DoD Directive 6050.7	<i>Environmental Effects Abroad of Major Department of Defense Actions</i>	31 March 1979
DoD Directive 6050.8	<i>Storage and Disposal of Non-DoD Owned Hazardous or Toxic Materials on DoD Installations</i>	27 February 1986
DoD Directive 6050.9	<i>Chlorofluorocarbons (CFCs) and Halons</i>	13 February 1989
DoD Directive 6050.16	<i>DoD Policy for Establishing and Implementing Environmental Standards at Overseas Installations</i>	20 September 1991
DoD Directive 6230.1	<i>Safe Drinking Water</i>	24 April 1978
DoD Instruction 7310.1	<i>Disposition of Proceeds from DoD Sales of Surplus Personal Property</i>	10 July 1989

RELATED PUBLICATIONS

A4.1. The following Air Force instructions relate to Robins AFB's environmental management system:

<u>Publication Number</u>	<u>Publication Title</u>	<u>Former Publication</u>	<u>Date</u>
General Procedures			
AFI 32-7001	<i>Environmental Budgeting</i>	No Former Publication	9 May 1994
AFI 32-7002	<i>Environmental Information Management System</i>	No Former Publication	31 May 1994
AFI 32-7005	<i>Environmental Protection Committees</i>	AFR 19-8	25 February 1994
AFI 32-7006	<i>Environmental Program in Foreign Countries</i>	No Former Publication	29 April 1994
AFI 48-119	<i>Medical Service Environmental Quality Programs</i>	No Former Publication	25 July 1994
AFI 63-118	<i>Civil Engineer Research, Development, and Acquisition</i>	No Former Publication	29 April 1994
Cleanup			
AFI 32-7020	<i>Environmental Restoration Program</i>	No Former Publication	19 May 1994
Compliance			
AFI 32-4002	<i>Hazardous Material Emergency Planning and Response Compliance</i>	AFR 19-8, AFR 355-1	1 December 1997
AFI 32-7040	<i>Air Quality Compliance</i>	AFP 19-5	9 May 1994
AFI 32-7041	<i>Water Quality Compliance</i>	AFP 19-5	13 May 1994
AFI 32-7042	<i>Solid and Hazardous Waste Compliance</i>	AFP 19-5, AFR 19-11	12 May 1994
AFI 32-7044	<i>Storage Tank Compliance</i>	No Former Publication	25 April 1994
AFI 32-7045	<i>Environmental Compliance Assessment and Management Program</i>	AFR 19-16	1 July 1998
AFI 32-7047	<i>Compliance Tracking and Reporting</i>	No Former Publication	31 May 1994
Conservation			
AFI 32-7060	<i>Interagency Intergovernmental Coordination for Environmental Planning</i>	AFR 19-9	25 March 1994
AFI 32-7061	<i>Environmental Impact Analysis Process</i>	AFR 19-2, AFR 19-3	24 January 1995
AFI 32-7062	<i>Base Comprehensive Planning</i>	AFR 86-4	1 October 1997

AFI 32-7063	<i>Air Installation Compatible Use Zone Program</i>	AFR 19-9	1 October 1998
AFI 32-7064	<i>Natural Resources Management</i>	AFR 126-1	1 August 1997
AFI 32-7065	<i>Cultural Resources Management</i>	AFR 126-7	13 June 1994
General Procedures			
AFI 32-7066	<i>Environmental Baseline Surveys for Real Estate Transactions</i>	No Former Publication	25 April 1994
Pollution Prevention			
AFI 32-7080	<i>Pollution Prevention Program</i>	AFR 19-15	12 May 1994
AFI 32-7086	<i>Hazardous Material Management</i>	No Former Publication	1 August 1997
AFMC Sup 1, AFI 32-7086	<i>Hazardous Material Managmeent</i>	No Former Publication	26 February 1998

Environmental Permits Issued to Robins AFB
Managed by EM

<u>PERMIT NUMBER</u>	<u>DATE</u>	<u>COVERS</u>	<u>PERMIT EXPIRES</u>
ORIGINAL INTERAGENCY AGREEMENT			
	23 JUN 89	FEDERAL FACILITY AGREEMENT BETWEEN U S ENVIRONMENTAL PROTECTION AGENCY & U S DEPARTMENT OF THE AIR FORCE & GA ENVIRONMENTAL PROTECTION DIVISION	
AIR QUALITY PERMITS			
9711-076-11459	04 NOV 94	OPERATION OF VARIOUS AIR POLLUTION SOURCES	
AMENDMENT TO 9711-076-11459	19 JAN 95	ELIMINATION OF VOC RECORDKEPPING RQMTS	
AMENDMENT TO 9711-076-11459	11 MAY 95	FOR CONSTRUCTION & OPERATION OF NEW 30.6 MM/BTU/HR NATURAL GAS/#2 FUEL OIL FIRED BOILER (SOURCE CODE B7, BLDG 644)	
AMENDMENT TO 9711-076-11459	24 APR 96	TO ALLOW CONSTRUCTION & OPERATION OF 2 NEW NATURAL GAS #2 FUEL FIRED BOILERS REMOVED FROM PERMIT.	
AMENDMENT TO 9711-076-11459	6 DEC 96	TO ALLOW OPERATION OF A HUSH HOUSE FOR JET ENGINE TESTING.	
AMENDMENT TO 9711-076-11459	7 MAY 97	TO ALLOW CONSTRUCTION & OPERATION OF A NEW PAINT BOOTH FOR COATING OF ACFT SUPPORT EQUIP WHICH REPLACES EXISTING BOOTH PERFORMING SAME FUNCTION	
AMENDMENT TO 9711-076-11459	21 AUG 97	TO ALLOW THE CONSTRUCTION & OPERATION OF 2 NEW NATURAL GAS/#2 FUEL OIL FIRED BOILERS & 2 NEW NATURAL GAS FIRED, INTERNAL COMBUSTION CHILLERS	
AMENDMENT TO 9711-076-11459	28 OCT 97	FOR CONSTRUCTION & OPERATION OF FLASHJET DEPAINTING OPERATION & OPERATION OF CHROMIUM ANODIZING & HARD CHROMIUM ELECTROPLATING OPERATIONS.	

<u>PERMIT NUMBER</u>	<u>DATE</u>	<u>COVERS</u>	<u>PERMIT EXPIRES</u>
AMENDMENT TO 9711-076-11459	5 MAR 98	TO ALLOW CONSTRUCTION & OPERATION OF TWO SOLVENT CLEANING MACHINES SUBJECT TO 40 CFR 63 SUBPART T	
AMENDMENT TO 9711-076-11459	19 MAR 98	TO ALLOW FOR THE CONSTRUCTION & OPERATION OF THE RADOME PAINT BOOTH IN BLDG. 670 AND A BACKSHOP PAINT BOOTH IN BLDG. 2316	
AMENDMENT TO 9711-076-11459	30 APR 98	TO ALLOW FOR THE OPERATION OF FOUR PEAK SHAVING GENERATORS	
AMENDMENT TO 9711-076-11459	29 JAN 99	TO ALLOW FOR THE CONSTRUCTION & OPERATION OF THE AIRCRAFT COMPONENT DEPAINTING OPERATION, EMISSION UNIT D005	

HAZARDOUS WASTE FACILITY PERMITS

HW-064(S)	21 SEP 98	STORAGE OF NO MORE THAN 30,360 GALS OF HAZ WASTE IN CONTAINERS AT DRMO HAZ WASTE STORAGE BLDG., STORAGE OF NO MORE THAN 30,000 GALS IN CONTAINERS OF HW W/I BLDG. 369, & STORAGE OF NO MORE THAN 41,250 GALS OF HW W/I BLDG. 352; INVESTIGATION AND CORRECTIVE ACTION OF SWMUs AND AOCs	21 SEP 2008
-----------	-----------	--	-------------

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMITS

GAR00000	1 JUN 98	AUTH FOR STORM WATER DISCHARGES ASSOCIATED W/INDUSTRIAL ACTIVITY	31 MAY 2003
GA0002852	30 OCT 98	AUTH TO DISCHARGE TO RECEIVING WATERS OF HORSE CREEK, TRIBUTARY TO OCMULGEE RIVER	31 AUG 2003

WATER PERMITS

076-0009	31 AUG 89	8 WELLS LOCATED AT RAFB	31 AUG 1999
CG1530042	24 APR 90	RAFB PUBLIC WATER SYSTEM	23 APR 2000

<u>PERMIT NUMBER</u>	<u>DATE</u>	<u>COVERS</u>	<u>PERMIT EXPIRES</u>
AMENDMENT TO CG1530042	21 SEP 92	(SAME AS ABOVE)	23 APR 2000
MODIFICATION TO CG1530042	24 APR 95	(SAME AS ABOVE)	23 APR 2000
APPROVAL LETTER	7 NOV 94	CONSTRUCTION OF WELL NO 18 REPLACEMENT FOR WELL NO 14)	7 NOV 1995
076-0012	16 FEB 95	GROUNDWATER USED TO MAINTAIN RECREATIONAL WATER LEVELS IN LAKE LUNA	20 FEB 2005

RADIOACTIVE MATERIAL PERMITS

10-30381-1AFP	3 NOV 93	HYDROGEN 3 FOR USE IN SENTEX SENSING TECH INC SCENTOGRAPH PLUS GAS CHROMAROGRAPH	30 NOV 1996
---------------	----------	--	-------------

INJECTION WELL OPERATING PERMITS

012	21 DEC 94	BLDG 173 SITE	21 DEC 1999
013	26 JUN 97	JP4, SITE SS10	26 JUN 2007

U S FISH & WILDLIFE SERVICE PERMITS

PRT-673810	1 JAN 89	AUTH TO SHOOT/KILL MIGRATORY BIRDS	31 DEC 1989
6435	22 OCT 96	SPECIAL PURPOSE DEPREDATION PERMIT	31 DEC 2000
		NUISANCE ANIMAL CONTRACT RENEWAL	31 JAN 1999

SOIL EROSION & SEDIMENTATION CONTROL PERMITS

1993-97

PERMITS BY RULE

2 INERT LANDFILL PERMITS

WETLANDS PERMITS

EM Published Management Plans – as of August 1999

Storm Water, OPR Pradip Badheka, 6-1197, ext 108

Pollution Prevention, OPR Becky McCoy, 6-1197, ext 126

Lead Based Paint, OPR Sam Rocker, 6-1197, ext 109

Asbestos Management, OPR Sam Rocker, 6-1197, ext 109

Facility Response Plan, OPR Renee Hill, 6-1197, ext 150

Hazardous Waste Management Plan, OPR Jim Reese, 6-1176

Hazardous Waste Reduction Plan, OPR Becky McCoy, 6-1197, ext 126

Hazardous Materials Management Plan, OPR Roger Cannon, 6-2909

Pollution Prevention Management Action Plan, OPR Pollution Prevention Division, 6-1197

Solid Waste Management Plan (This plan includes the *Qualified Recycling Program Plan*), OPRs Linda Larson, 6-1197, ext 137 and Becky Mitchel, 6-1197, ext 138

Recoverable & Waste Petroleum Management Plan, OPR Linda Larson, 6-1197, ext 137

Natural Resources Management Plan, OPR Dr Bob Sargent, 6-1197, ext 156

Cultural Resources Management Plan, OPRs Cheryl Hull, 6-1197, ext 155 and Bobby Ellis, 6-1197, ext 119

Installation Restoration Program Management Action Plan, OPR Restoration Division, 6-1197

Community Relations Management Plan, OPR Charline Logue, 6-1197, ext 128

Clean Air Act Risk Management Plan, OPR Mark Summers, 6-1197, ext 149

Internal ECAMP

Date of Finding:_____ **Finding Number:**_____

Protocol:_____

Rating: **Significant** **Major** **Minor** **Positive** (circle one)

Bldg. Number:_____ **Location (optional):**_____

Finding Title:_____

Details:_____

**Responsible
Organization:**_____

Organization POC:_____ **POC's Phone #:**_____

Federal Requirement:_____

Other Criteria:_____

Manual Item Number:_____ **Manual:** **TEAM Guide** **State Sup** **AF Sup** (circle one)

Carryforward Finding? **yes** **no** (circle one) **Old Tracking Number:**_____

Repeat Finding? **yes** **no** (circle one) **Old Tracking Number:**_____

**Suggested
Solution:**_____

Corrective Actions Taken:_____

